

Request for an Extension of Exemption No. 17200, 14 CFR § 121.311

I am writing to request an extension of Exemption No. 17200 issued to **Mr. Scott and Mrs. Sara Koblentz**, parents of **Victoria Lynn Koblentz**, from certain requirements of Title 14 of the Code of Federal Regulations (14 CFR) § 121.311(b). This exemption allows **Victoria Lynn Koblentz** to use an appropriately sized and dynamically tested restraint system that conforms to the Federal Motor Vehicle Safety Standard No. 213 during all phases of flight, including ground movement, takeoff, and landing. In addition, any air carrier or commercial operator operating under part 121 while **Victoria Lynn Koblentz** is aboard its aircraft was also granted an exemption from 14 CFR § 121.311(b)(2)(iii)(B) to the extent necessary to allow **Victoria Lynn Koblentz** to use an appropriately sized and dynamically tested restraint system that conforms to the Federal Motor Vehicle Safety Standard No. 213 during use of that restraint system aboard an aircraft.

My daughter is 8 years old, weighs 44 pounds, and is 54.5 inches tall. Her chest measures 27 inches. My daughter's physical condition is as follows: **has Type 1 Spinal Muscular Atrophy. This requires her to lay flat, and leaves her with almost no mobility whatsoever.** As a result of her physical condition, she needs the support and security provided by an appropriately sized and dynamically tested restraint system that conforms to the Federal Motor Vehicle Safety Standard No. 213 but because of her physical needs is incapable of compliance with the regulation.

I am also submitting the following contact information:

Scott and Sara Koblentz
11154 Montaubon Way Dr, San Diego CA, 92131
Skoblentz@gmail.com

I understand that the regulation is written to create a high level of safety for individual passengers by ensuring that they are securely restrained in their seats during all phases of flight. The regulation also ensures that an individual does not cause harm to other passengers on the airplane by being thrown into them during turbulent or emergency conditions.

Exemption No. 17200 allows **Victoria Lynn Koblentz** to occupy an appropriately sized and dynamically tested restraint system that conforms to the Federal Motor Vehicle Safety Standard No. 213 **(EZ on Adjustable Vest by EZ on model 101M2 <https://www.healthproductsforyou.com/p-e-z-on-adjustable-vest.html>)**. This dynamically tested restraint system conforms to the Federal Motor Vehicle Safety Standard No. 213, and use of this restraint system ensures a high level of safety for **Victoria Lynn Koblentz** and a high level of safety for the other passengers and crew on the airplane. In fact, in **Victoria Lynn Koblentz's** case, safety is greatly enhanced by the extra support and security that the restraint system provides during the entire flight.

Enhancing safety for **Victoria Lynn Koblentz** remains in the public interest. In addition, the public interest is also served by the fact that the use of this restraint system allows her to use commercial air transportation. Without the support and security of this restraint system, she would be unable to fly commercially.

Additionally, the relief granted by this exemption ensures an equivalent level of safety to that provided by the affected regulation. Since the issuance of the original exemption, there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

If it is necessary to put a summary in the Federal Register, I submit the following:

This is a request for an extension of an exemption from § 121.311 (b) to the extent required for a child to continue to use an appropriately sized and dynamically tested restraint system that conforms to the Federal Motor Vehicle Safety Standard No. 213 on an aircraft. Due to physical challenges, without the support and security of this restraint system, this child is unable to fly. In this case, the safety of this child is greatly enhanced by the extra support and security that the restraint system provides **her** during the flight.

Thank you for your consideration of this request.